

SCHIFF HARDIN LLP
Stephen M. Hankins (Cal. Bar No. 154886)
One Market, Spear Street Tower
Thirty-Second Floor
San Francisco, CA 94105
Telephone: (415) 901-8700
Facsimile: (415) 901-8701
Email: shankins@schiffhardin.com

Attorneys for Defendant
EASTMAN KODAK COMPANY

J. Christopher Jaczko (149317)
Allison H. Goddard (211098)
JACZKO GODDARD LLP
4401 East Gate Mall
San Diego, CA 92121
Telephone: (858) 550-6150
Facsimile: (858) 225-3500

Attorneys for Plaintiff and
Counterclaim Defendant
DR SYSTEMS, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DR SYSTEMS, INC., a California
corporation,

Plaintiff,

v.

EASTMAN KODAK COMPANY, a New
Jersey corporation,

Defendant.

AND RELATED COUNTERCLAIMS.

Case No. 08 CV 0669 H BLM

**JOINT MOTION FOR ENTRY OF
[PROPOSED] PROTECTIVE ORDER**

Courtroom: 13, Fifth Floor
Judge: The Honorable Marilyn L. Huff

1 Plaintiff and counterclaim defendant DR Systems, Inc. and defendant and counterclaimant
2 Eastman Kodak Company, by and through their respective counsel, hereby jointly move the Court
3 for entry of the [Proposed] Protective Order submitted concurrently herewith to the Court.

4 Good cause exists for entry of the [Proposed] Protective Order. In the course of this
5 litigation, the parties expect that some of the documents and information (“materials”) that will be
6 produced through discovery in this action would be, for competitive and other reasons, normally
7 kept confidential by the parties. The materials may contain trade secret or other confidential
8 research, technical, cost, price, marketing, or other commercial information that is contemplated
9 by Rule 26(c)(7) of the Federal Rules of Civil Procedure.

10 The parties therefore request that the Court enter the [Proposed] Protective Order to
11 protect the confidentiality of such materials as much as practical during this litigation.

12
13 Respectfully submitted,
14 Dated: July 31, 2008 JACZKO GODDARD LLP

15
16 By: /s/ Allison H. Goddard
17 Allison H. Goddard
18 Attorneys for Plaintiff and Counterclaim
Defendant DR SYSTEMS, INC.

19 Dated: July 31, 2008 SCHIFF HARDIN LLP

20
21 By: /s/ Stephen M. Hankins
22 Stephen M. Hankins
23 Attorneys for Defendant and
24 Counterclaimant
25 EASTMAN KODAK COMPANY
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Certificate of Service

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 31st day of July, 2008 with a copy of this document via the Court's CM/ECF system. I certify that all parties in this case that have made an appearance to date are represented by counsel who are CM/ECF participants.

By: /s/ Allison H. Goddard

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